

## **LIST OF EXHIBITS AND WITNESSES**

1 **KNIGHT LAW GROUP LLP**

2 Steve Mikhov (SBN 224676)  
3 Scot D. Wilson (SBN 223367)  
4 Roger Kirnos (SBN 283163)  
5 10250 Constellation Blvd., Suite 2500  
6 Los Angeles, CA 90067  
7 Telephone: (310) 552-2250

8 **WIRTZ LAW APC**

9 Richard M. Wirtz (SBN 137812)  
10 Jessica R. Underwood (SBN 306481)  
11 4370 La Jolla Village Drive, Suite 800  
12 San Diego, California 92122  
13 Telephone: (858) 259-5009

14 Attorneys for Plaintiff, LORENA GODINEZ

15 **LEHRMAN LAW GROUP**

16 Kate S. Lehrman (SBN 123050)  
17 Daniel R. Villegas (SBN 159935)  
18 Andrew K. Stefatos (SBN 306697)  
19 12121 Wilshire Boulevard, Suite 1300  
20 Los Angeles, CA 90025  
21 Telephone: (310) 917-4500

22 Attorneys for Defendant, BMW OF NORTH AMERICA, LLC

23 **UNITED STATES DISTRICT COURT**

24 **CENTRAL DISTRICT OF CALIFORNIA**

25 **LORENA GODINEZ,**

26 Plaintiff,

27 vs.

28 **BMW OF NORTH AMERICA, LLC,  
a Delaware Limited Liability  
Company, and DOES 1 through 10,  
inclusive,**

Defendants.

Case No.: 2:17-cv-5072-FLA (RAOx)

**AMENDED JOINT EXHIBIT  
LIST**

1 Plaintiff LORENA GODINEZ and Defendant BMW OF NORTH  
 2 AMERICA, LLC, by and through counsel, hereby submit the following exhibit list  
 3 for the trial in the above-entitled action. The parties reserve the right to introduce  
 4 exhibits designated and/or listed and/or offered by any party to this action, and  
 5 hereby reserve the right to object to the admissibility of any exhibits designated,  
 6 listed, and/or offered by any other party to this action. The parties further reserve the  
 7 right to introduce exhibits for the purpose of impeachment, rebuttal, or rehabilitation  
 8 and reserves the right to introduce additional exhibits upon appropriate notice to all  
 9 parties. The Parties further hereby reserve the right to introduce additional exhibits  
 10 as necessary, including, but not limited to any and all exhibits marked and attached  
 11 to the depositions of any fact or expert witness taken in this action. The Parties  
 12 further reserve the right to augment this Exhibit List following the conferencing with  
 13 one another's counsel that is required pursuant to local rules.

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### PLAINTIFF'S EXHIBITS

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
1.	Retail Installment Sale Contract dated 12/31/09	X	X	ADMITTED		8/16/21

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
2.	EXCLUDED					
3.	EXCLUDED					

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
4.	McKenna BMW Repair Order No. 178380 dated 10/11/10 (GODINEZ000224-33) (Lorena Godinez vs. BMWNA 30)	X	X	<b>ADMITTED</b>		8/12/21
5.	McKenna BMW Repair Order No. 184358 dated 1/24/11 (GODINEZ000234-44) (Lorena Godinez vs. BMWNA 28-29)		X	<b>Sustained pending evidence at trial</b>		
6.	EXCLUDED					
7.	McKenna BMW Repair Order No. 202850 dated 1/16/12 (GODINEZ000126-30) (GODINEZ000257-70) (Lorena Godinez vs. BMWNA 24-25)		X	<b>Sustained pending evidence at trial</b>		
8.	WITHDRAWN					

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
9.	McKenna BMW Repair Order No. 218120 dated 10/31/12 (GODINEZ000137-52) (GODINEZ000284-308) (Lorena Godinez vs. BMWNA 18-21)	X		<b>ADMITTED</b>		8/12/21
10.	EXCLUDED					
11.	EXCLUDED					
12.	McKenna BMW Repair Order No. 224484 dated 3/11/13 (GODINEZ000163-66) (GODINEZ000333-44) (Lorena Godinez vs. BMWNA 14)	X				8/16/21
13.	McKenna BMW Repair Order No. 232745 dated 8/8/13 (GODINEZ000167-77) (GODINEZ000345-62) (Lorena Godinez vs. BMWNA 11-13)	X		<b>ADMITTED</b>		8/12/21
14.	WITHDRAWN					

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
15.	McKenna BMW Repair Order No. 239846 dated 12/27/13 (GODINEZ000185-94) (GODINEZ000383-401) (Lorena Godinez vs. BMWNA 6-8)	X		<b>ADMITTED</b>		8/12/21
16.	McKenna BMW Repair Order No. 240249 dated 1/4/14 (GODINEZ000195-96) (GODINEZ000402-12)	X		<b>ADMITTED</b>		8/16/21
17.	New Century BMW Repair Order No. 915264 dated 11/26/14 (GODINEZ000197-200) (GODINEZ000417-28)	X		<b>Sustained pending evidence at trial</b>		
18.	New Century BMW Repair Order No. 944017 dated 10/24/15 (GODINEZ000429-33) (GODINEZ000435) (GODINEZ000437-57)	X		<b>Sustained pending evidence at trial</b>		

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
19.	New Century BMW Repair Order No. 973019 dated 9/26/16 (GODINEZ000210-12) (GODINEZ000459-62) (GODINEZ000471-501) (Lorena Godinez vs. BMWNA 32-37)	X		<b>ADMITTED</b>		8/12/21
20.	New Century BMW Repair Order No. 979975 dated 12/9/16 (GODINEZ000503-06) (GODINEZ000509-58)	X		<b>ADMITTED</b>		8/12/21
21.	New Century BMW Repair Order No. 1002966 dated 8/30/17 (Lorena Godinez vs. BMWNA 39-40)	X		<b>ADMITTED</b>		8/12/21
22.	New Century BMW Repair Order No. 1033915 dated 8/28/18 (Lorena Godinez vs. BMWNA 50-52)	X		<b>ADMITTED</b>		8/16/21

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
23.	New Century BMW Repair Order No. 1039168 dated 10/29/18 (Lorena Godinez vs. BMWNA 63-65)	X		<b>ADMITTED</b>		8/16/21
24.	WITHDRAWN					
25.	WITHDRAWN					
26.	EXCLUDED					
27.	EXCLUDED					
28.	EXCLUDED					
29.	EXCLUDED					
30.	WITHDRAWN					
31.	DMV Documents (Lorena Godinez vs. BMWNA 3-4, 58, 92, additional pages)	X	X	<b>ADMITTED</b>		8/16/21
32.	Insurance Documents (Lorena Godinez vs. BMWNA 5, 59-62, 77-80, 90-91, 93-111)			<b>ADMITTED</b>		8/16/21
33.	WITHDRAWN					
34.	Email from BMW to Plaintiff RE: Plaintiff's Repurchase Request dated 11/10/16 (Lorena Godinez v. BMWNA 56-57)	X	X	<b>ADMITTED</b>		8/16/21

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
35.	Internal BMW Email RE: Plaintiff's Repurchase Request dated 11/10/16 (GODINEZ000219)	X	X	<b>ADMITTED</b>		8/16/21
36.	Service History Recap through 9/26/16 (GODINEZ000119-20)			<b>Subject to Foundation</b>	8/16/21	
37.	WITHDRAWN					
38.	WITHDRAWN					
39.	WITHDRAWN					
40.	WITHDRAWN					
41.	WITHDRAWN					
42.	WITHDRAWN					
43.	Service Request Detail 201631205281 dated 11/23/16 (GODINEZ000081-86)	X	X	<b>ADMITTED</b>		8/16/21
44.	SI B 63 06 10 – LEDs in Rear Lamp Inoperative (GODINEZ000593)	X	X	<b>ADMITTED</b>		
45.	WITHDRAWN					
46.	WITHDRAWN					
47.	WITHDRAWN					

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
48.	SI B 12 18 14 – Engine Misfire Due to Failed Ignition Coil (GODINEZ000586-88)	X		<b>ADMITTED</b>		8/12/21
49.	WITHDRAWN					
50.	WITHDRAWN					
51.	WITHDRAWN					
52.	Service and Warranty Information Booklet – 2010 1 Series, 3 Series, 5 Series, 6 Series (GODINEZ000001-61)	X	X	<b>ADMITTED</b>		8/12/21
53.	WITHDRAWN					
54.	Owner's Manual for Vehicle – 328i, 328i xDrive, 335i, 335i xDrive, M3	X	X	<b>ADMITTED</b>		

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
55.	Photographs of Vehicle (Lorena Godinez vs. BMWNA 46-49) (Exhibit 4 Plaintiff's Depo) (Lorena Godinez vs. BMWNA 81)			<b>ADMITTED AS TO PHOTOGRAPHS 1 THROUGH 9. DEFENDANT OBJECTS TO PHOTOGRAPH 10 AND DID NOT AGREE TO PHOTOGRAPH 10 AT THE AUGUST 5, 2021 CONFERENCE; PLAINTIFF CONTENDS THIS ENTIRE EXHIBIT PAGES 1-10 WAS RULED UPON AT THE CONFERENCE.</b>		8/16/21
56.	WITHDRAWN					
57.	WITHDRAWN					
58.	WITHDRAWN					
59.	WITHDRAWN					
60.	New Century BMW Repair Order No. 1074082 dated 1/2/20	X		<b>ADMITTED</b>		8/16/21
61.	EXCLUDED					
62.	WITHDRAWN					
63.	WITHDRAWN					
64.	WITHDRAWN					
65.	New Century BMW Repair Order No. 1098631 dated 2/3/21	X		<b>ADMITTED</b>		8/16/21
66.	WITHDRAWN					

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection/ Response	Date Id.	Date Adm.
67.	New Century BMW Repair Order No. 1104508 dated 5/13/21	X		<b>ADMITTED</b>		8/16/21
68.	2010 BMW 3 Series Coupe Sales Brochure – 328i, 328i xDrive, 335i, 335i xDrive			<b>ADMITTED</b>		8/12/21
69.	New Century BMW Repair Order No. 1081441 dated 4/23/20			<b>DEFENDANT OBJECTS TO THIS EXHIBIT AS PLAINTIFF ADDED THIS EXHIBIT TO THE EXHIBIT LIST ON AUGUST 9, 2021, AFTER BOTH PRETRIAL CONFERENCES WERE HELD</b>		8/16/21
70.	<i>Reserved</i>					

DEFENDANT'S EXHIBITS

Exhibit No.	Description	Stip to Auth.	Stip to Admit	Objection Response	Date Id.	Date Adm.
1000.	Vehicle Repair Timelines			Demonstrative Only	8/17/21	
1001.	WITHDRAWN					
1002.	Vehicle Warranty History	X		ADMITTED		8/17/21
1003.	WITHDRAWN					
1004.	WITHDRAWN					
1005.	WITHDRAWN					
1006.	Carfax re subject vehicle			ADMITTED	8/17/21	
1007.	Luis Holguin expert disclosure and expert report				8/17/21	
1008.	WITHDRAWN					
1009.	Diagram Re Oil Filter Housing Gasket and Gasket; and Exemplar Oil Filter Housing Gasket and Gasket			ADMITTED		8/12/21
1010.	Diagram Re Drive Belt Pulley, Idler Pulley, and Power Steering Pump			ADMITTED		

1	1011.	Diagram Re Coolant System		ADMITTED		8/12/21
2	1012.	WITHDRAWN				
3	1013.	Diagram Re Valve Cover and Exemplar Valve Cover Gasket		ADMITTED		8/17/21
4	1014.	Diagram Re O2 Sensor		ADMITTED		8/12/21
5	1015.	Foot Well Module Description		WITHDRAWN		
6	1016.	Exemplar Tail Lamp LED Circuit Board				8/17/21
7	1017.	WITHDRAWN				
8	1018.	WITHDRAWN				
9	1019.	WITHDRAWN				
10	1020.	Ignition Coil Diagram		ADMITTED		8/12/21
11	1021.	Exemplar Valve Cover		ADMITTED		
12	1022.	Customer Contact Log		ADMITTED		
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1	1023.	Email dated 12/19/16 to Jose Conde re additional vehicle repair with attached documents	X	X	ADMITTED PAGES 1- 3; MUST LAY FOUNDATION FOR PAGE 4		8/16/21
4	1024.	Email re Jose Conde's Response to 12/19/16 email	X	X	ADMITTED		8/16/21
6	1025.	Oil Filter Housing Gasket				8/17/21	8/17/21
9	1026.	Valve Cover and Exemplar Valve Cover Gasket				8/17/21	8/17/21

11  
12 Respectfully Submitted,

13 DATED: August 24, 2021 **KNIGHT LAW GROUP, LLP**

16 By: /s/ Scot D. Wilson

17 Steve Mikhov

18 Scot D. Wilson

19 Roger Kirnos

20 Attorneys for Plaintiff,  
LORENA GODINEZ

21 DATED: August 24, 2021 **LEHRMAN LAW GROUP**

24 By: /s/ Daniel R. Villegas

25 Daniel R. Villegas

26 Attorneys for Defendant,

27 BMW OF NORTH AMERICA, LLC

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